

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**ATTORNEY MONTHLY FEE STATEMENT COVER SHEET**  
**FOR THE PERIOD APRIL 18, 2023 THROUGH APRIL 30, 2023**

In re LTL Management LLC

Applicant: Cole Schotz P.C.

Case No. 23-12825 (MBK)

Client: Ad Hoc Committee of Supporting  
Counsel

Chapter 11

Case Filed: April 4, 2023

COMPLETION AND SIGNING OF THIS FORM CONSTITUTES A CERTIFICATION  
UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746.

/s/ Michael D. Sirota 07/18/2023  
MICHAEL D. SIROTA Date

<p style="text-align: center;"><b>SECTION I</b> <b>FEE SUMMARY</b></p>
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Summary of Amounts Requested for the Period  
April 18, 2023 through April 30, 2023 (the “**Compensation Period**”)

Total Fees	\$96,181.00
Total Disbursements	\$587.90
Minus % holdback of Fees	\$19,236.20
Amount Sought at this Time	\$77,532.70

Summary of Amounts Requested for Previous Periods

Total Previous Fees and Expenses Requested:	\$0.00
Total Fees and Expenses Allowed to Date:	\$0.00
Total Retainer Remaining:	\$0.00
Total Holdback:	\$0.00
Total Received by Applicant:	\$0.00

<b>Name of Professional and Title</b>	<b>Year Admitted</b>	<b>Hours</b>	<b>Rate</b>	<b>Fee</b>
Michael D. Sirota Member	1986	9.70	\$1,200.00	\$11,640.00
Warren A. Usatine Member	1995	5.60	\$950.00	\$5,320.00
Seth Van Aalten Member	2004	35.70	\$950.00	\$33,915.00
Justin R. Alberto Member	2008	12.20	\$740.00	\$9,028.00
Ryan T. Jareck Member	2008	9.40	\$695.00	\$6,533.00
Sarah A. Carnes Member	2015	14.70	\$760.00	\$11,172.00
Mark Tsukerman Member	2010	9.90	\$625.00	\$6,187.50
Stacy L. Newman Member	2007	1.10	\$650.00	\$715.00
Bryant P. Churbuck Associate	2018	13.10	\$460.00	\$6,026.00
Larry S. Morton Paralegal	n/a	15.90	\$355.00	\$5,644.50
<b>TOTALS</b>	<b>n/a</b>	<b>127.30</b>	<b>n/a</b>	<b>\$96,181.00</b>

**SECTION II  
SUMMARY OF SERVICES**

<b>Services Rendered</b>	<b>Hours</b>	<b>Fee</b>
Asset Analysis	0.00	\$0.00
Asset/Business Disposition	0.00	\$0.00
Assumption and Rejection of Leases and Contracts	0.00	\$0.00
Preference Actions/Response	0.00	\$0.00
Budgeting (Case)	0.00	\$0.00
Business Operations	0.00	\$0.00
Case Administration	51.30	\$31,670.50
Claims Administration and Objections	0.00	\$0.00
Corporate Governance and Board Matters	0.00	\$0.00
Data Analysis	0.00	\$0.00
Employee Benefits/Pensions	0.00	\$0.00
Fee Application Preparation	0.00	\$0.00
Fee Employment	0.60	\$390.00
Fee Objections	0.00	\$0.00
Financing	0.00	\$0.00
Litigation	67.50	\$56,804.50
Meetings of Creditors	0.00	\$0.00
Disclosure Statement	0.00	\$0.00
Plan of Reorganization	7.90	\$7,316.00
Real Estate	0.00	\$0.00
Regulatory Compliance	0.00	\$0.00
Relief from Stay	0.00	\$0.00
Reporting	0.00	\$0.00
Tax Issues	0.00	\$0.00
Valuation	0.00	\$0.00
Non-Working Travel	0.00	\$0.00
<b>SERVICES TOTALS</b>	<b>127.30</b>	<b>\$96,181.00</b>

**SECTION III  
SUMMARY OF DISBURSEMENTS**

<b>Disbursements</b>	<b>Amount</b>
Photocopying / Printing / Scanning	\$4.40
Court Fees	\$60.60
Delivery Services / Federal Express	\$0.00
Outside Printing	\$0.00
Filing Fees	\$0.00
Travel – Mileage/Tolls	\$0.00
Other (Explain)	\$0.00
Depositions Transcript	\$522.90
<b>DISBURSEMENTS TOTAL</b>	<b>\$587.90</b>

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

PAUL HASTINGS LLP  
200 Park Avenue  
New York, New York 10166  
Kristopher M. Hansen (*admitted pro hac vice*)  
Ryan P. Montefusco (*admitted pro hac vice*)

PAUL HASTINGS LLP  
71 South Wacker Drive, Suite 4500  
Chicago, Illinois 60606  
Matthew M. Murphy (*admitted pro hac vice*)  
Matthew Micheli (*admitted pro hac vice*)

COLE SCHOTZ P.C.  
Court Plaza North  
25 Main Street  
P.O. Box 800  
Hackensack, New Jersey 07602-0800  
Michael D. Sirota  
Warren A. Usatine  
Seth Van Aalten (*admitted pro hac vice*)  
Justin Alberto (*admitted pro hac vice*)

PARKINS & RUBIO LLP  
700 Milam, Suite 1300  
Houston, Texas 77002  
Lenard M. Parkins (*admitted pro hac vice*)  
Charles M. Rubio (*admitted pro hac vice*)

*Counsel to Ad Hoc Committee of Supporting  
Counsel*

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**MONTHLY FEE STATEMENT OF COLE SCHOTZ P.C.,  
AD HAC COMMITTEE OF SUPPORTING COUNSEL, FOR THE  
PERIOD APRIL 18, 2023 THROUGH APRIL 30, 2023**

Cole Schotz P.C. (“Cole Schotz”) submits this Monthly Fee Statement (the “Statement”) for services rendered and expenses incurred as Counsel to the Ad Hoc Committee of Supporting Counsel<sup>2</sup> for the period commencing April 18, 2023 and ending April 30, 2023 (the “Statement Period”), pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Retained Professions* [Docket No. 562] (as modified, the “Interim Fee Procedures Order”).

The billing invoices, along with a detailed breakdown of all out-of-pocket disbursements necessarily incurred by Cole Schotz for the Statement Period are annexed hereto. These invoices detail the services performed by Cole Schotz.

The fees requested and expenses incurred in this Statement are as follows:

<b>Fees (100%)</b>	<b>Fee Holdback (20%)</b>	<b>Fee Payment (80%)</b>	<b>Expense Reimbursement (100%)</b>
\$96,181.00	\$19,236.20	\$76,944.80	\$587.90

*[Remainder of page left intentionally blank]*

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<sup>2</sup> On June 20, 2023, the Bankruptcy Court entered the *Order Authorizing the Debtor to Enter into an Expense Reimbursement Agreement with Ad Hoc Committee of Supporting Counsel* [Docket No. 838] that provides for the reimbursement of fees from April 18, 2023 through the termination of the Reimbursement Agreement (together, the “Fees and Expenses”).

WHEREFORE, Cole Schotz respectfully requests payment of fees and reimbursement of expenses for the Statement Period of \$77,532.70 (80% of total fees and 100% of expenses) in accordance with the Reimbursement Order.

Dated: July 18, 2023

**COLE SCHOTZ P.C.**  
*Counsel to Ad Hoc Committee  
of Supporting Counsel*

/s/ Michael D. Sirota  
Michael D. Sirota (NJ Bar No. 014321986)



# **Exhibit A**



LTL MANAGEMENT LLC  
N/A

Invoice Date: July 13, 2023  
Invoice Number: 953095  
Matter Number: 66055-0001

Re: LTL AD HOC GROUP

FOR PROFESSIONAL SERVICES THROUGH APRIL 30, 2023

CASE ADMINISTRATION			51.30	31,670.50
<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/19/23	WAU	CALL WITH CS/PH TEAM RE: ENGAGEMENT AND BACKGROUND	0.30	285.00
04/19/23	MDS	TELEPHONE FROM ATTORNEY/CO-COUNSEL K. HANSEN ET AL RE: RETENTION	0.50	600.00
04/19/23	LSM	UPDATE, FILE AND CIRCULATE TO S. VAN AALTEN AND J. ALBERTO THE NOTICE OF APPEARANCE	0.80	284.00
04/19/23	SVA	CORRES W/ AHG RE PSAS	0.30	285.00
04/19/23	SVA	CORRES W/ L. MORTON RE NOA	0.30	285.00
04/19/23	WAU	CONFERENCE CALL WITH CLIENTS RE: CASE ISSUES AND BACKGROUND	0.30	285.00
04/19/23	WAU	PRELIM REVIEW OF CASE ISSUES AND FILINGS	0.80	760.00
04/19/23	LSM	DRAFT AMENDED NOTICE OF APPEARANCE AND FORWARD TO J. ALBERTO AND S. VAN AALTEN	0.70	248.50
04/19/23	JRA	INITIAL CALLS WITH CLIENTS, PAUL HASTINGS AND INTERNALLY RE IMMEDIATE ACTION ITEMS	2.10	1,554.00
04/19/23	MDS	CONFERENCE WITH ATTORNEY/CO-COUNSEL S. VAN AALTEN/W. USATINE RE: STRATEGY	0.50	600.00
04/19/23	WAU	REVIEW PROPOSED STATEMENT BY SUPPORTING COUNSEL	0.20	190.00
04/19/23	MDS	TELEPHONE FROM ATTORNEY/CO-COUNSEL CO-COUNSEL RE: STRATEGY	0.50	600.00
04/20/23	LSM	ARRANGE E-NOTICING FOR COLE SCHOTZ TEAM	0.40	142.00
04/20/23	MDS	LISTEN TO JUDGE KAPLAN RULINGS	0.80	960.00
04/20/23	LSM	FILE AND CIRCULATE TO J. ALBERTO THE INITIAL STATEMENT OF AD HOC COMMITTEE OF SUPPORTING TALC CLAIMANTS	0.60	213.00
04/20/23	LSM	DRAFT PRO HAC VICE TEMPLATE AND FORWARD TO CO-COUNSEL	0.40	142.00
04/20/23	LSM	RESEARCH PRO HAC FILING PROCEDURES FOR NJ	0.50	177.50
04/20/23	MT	ATTEND COURT HEARING RE: IMPOSITION OF STAY; REVIEW CASE PLEADINGS; EMAIL CORRESPONDENCE WITH CO-COUNSEL RE: SAME	4.20	2,625.00

COLE SCHOTZ P.C.

Re: LTL AD HOC GROUP  
Client/Matter No. 66055-0001

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July 13, 2023  
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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/20/23	RTJ	REVIEW LTL PLEADINGS; REVIEW LTL DECISIONS	2.80	1,946.00
04/20/23	SVA	CORRES W/ CO-COUNSEL RE NOA AND PRO HACs	0.20	190.00
04/20/23	BPC	REVIEW DOCUMENTS RE: 2021 CASE FILINGS AND RELATED DOCUMENTS	0.80	368.00
04/20/23	BPC	ATTEND 4/20 HEARING	0.70	322.00
04/20/23	LSM	DRAFT, FILE AND CIRCULATE TO S. VAN AALTEN THE AMENDED NOTICE OF APPEARANCE	0.50	177.50
04/20/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. VAN AALTEN AND M. TSUKERMAN RE: 4/20 HEARING	0.30	138.00
04/20/23	BPC	REVIEW EMAILS FROM S. VAN AALTEN AND M. TSUKERMAN RE: AD HOC GROUP OF SUPPORTING CLAIMANTS	0.30	138.00
04/20/23	BPC	REVIEW LTL CASE INFORMATION AND PROCEDURES (.40)	0.40	184.00
04/20/23	JRA	EMAILS WITH W. USATINE, S. VAN AALTEN, PH AND LM RE AMENDED NOTICE OF APPEARANCE AND PRO HACs	0.80	592.00
04/21/23	JRA	CORRESPOND WITH S. VAN AALTEN AND LM RE INITIAL FILINGS	0.60	444.00
04/21/23	LSM	DRAFT TWO PRO HAC VICE MOTION FOR PARKINS AND RUBIO AND FORWARD SAME TO CO-COUNSEL	0.90	319.50
04/21/23	JRA	T/C WITH TALC CLAIMANT (.3) AND FOLLOW UP CALLS WITH K. HANSEN AND S. VAN AALTEN (.3) RE ENGAGEMENT AND IMMEDIATE ACTION ITEMS	0.60	444.00
04/21/23	SVA	REVIEWED PROPOSED BYLAWS	0.40	380.00
04/21/23	LSM	REVIEW BANKRUPTCY COURT DOCKET AND UPDATE BANKRUPTCY CASE CALENDAR WITH OBJECTION DEADLINES AND HEARING DATES	0.70	248.50
04/21/23	LSM	DRAFT THREE PRO HAC VICE MOTION FOR PAUL HASTINGS AND FORWARD TO CO-COUNSEL	1.50	532.50
04/23/23	LSM	ORDER ALL HEARING TRANSCRIPTS FOR NEW BANKRUPTCY CASE	0.40	142.00
04/23/23	SYC	EMAIL TO SVA RE: NJ PROJECT CODES	0.60	456.00
04/23/23	LSM	EMAILS WITH CO-COUNSEL REGARDING EDITS/REVISIONS TO PRO HAC VICE MOTIONS	0.50	177.50
04/24/23	LSM	PROCESS PAYMENT FOR HEARING TRANSCRIPTS	0.20	71.00
04/24/23	LSM	REVISE, FILE FIVE PRO HAC VICE MOTIONS FOR CO-COUNSEL	0.70	248.50
04/24/23	JRA	EMAILS (.1) AND T/C (.2) WITH S. VAN AALTEN RE ADMINISTRATIVE ITEMS AND FOLLOW UP WITH PH	0.30	222.00
04/24/23	SYC	REVIEW MOTION TO DISMISS AND SUPPORTING DOCUMENTS; CALL WITH SVA RE: SAME	2.10	1,596.00
04/24/23	LSM	EMAILS WITH CO-COUNSEL REGARDING CRITICAL DATES CALENDARING	0.50	177.50
04/24/23	LSM	COMPILE, REVIEW ALL HEARING TRANSCRIPTS FROM TRANSCRIBER AND FORWARD SAME TO S. VAN AALTEN AND CO-COUNSEL WITH COMMENTS	0.60	213.00

Re: LTL AD HOC GROUP  
 Client/Matter No. 66055-0001

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<b><u>DATE</u></b>	<b><u>INITIALS</u></b>	<b><u>Description</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
04/24/23	SVA	CORRES W/ M. MICELI RE 2019 STATEMENT	0.20	190.00
04/25/23	SYC	REVIEW COMMITTEE BYLAWS	0.20	152.00
04/25/23	LSM	UPDATE BANKRUPTCY CASE CALENDAR WITH OBJECTION/FILING DEADLINES AND HEARING DATES	0.60	213.00
04/25/23	LSM	EMAILS WITH M. MAGZMEN REGARDING HEARING INSTRUCTIONS AND PROTOCOL	0.40	142.00
04/25/23	MDS	REVIEW DETAILED WORKSREAMS, CONFERENCE WITH TEAM, ANTICIPATED FILINGS	1.90	2,280.00
04/25/23	LSM	RESEARCH PRECEDENT PLEADINGS AND FORWARD SAME TO L. MILIOTES	0.50	177.50
04/26/23	BPC	REVIE PAUL CROUCH'S OBJECTION TO MOTION FOR APPOINTMENT OF FUTURE CLAIMS REPRESENTATIVE	0.20	92.00
04/26/23	SYC	REVIEW DRAFT PRO HAC AND EMAIL TO L. MORTON RE: SAME	0.50	380.00
04/26/23	LSM	UPDATE BANKRUPTCY CASE CALENDAR WITH HEARING DATES AND ADDITIONAL ATTORNEYS	0.30	106.50
04/26/23	BPC	REVIEW TCC'S MOTION TO SEAL PORTIONS OF ITS OBJECTION TO MOTION FOR APPOINTMENT OF FUTURE CLAIMS REPRESENTATIVE	0.10	46.00
04/26/23	LSM	COMPILE AND CIRCULATE TO S. CARNES TWO DRAFT PRO HAC MOTIONS WITH COMMENTS RE: J. ALBERTO AND S. VAN AALTEN	0.20	71.00
04/26/23	LSM	EMAILS WITH M MAGZAMEN REGARDING E-NOTICING AND CASE MANAGEMENT	0.40	142.00
04/26/23	BPC	REVIEW TCC'S MOTION TO DISMISS	0.50	230.00
04/26/23	BPC	REVIEW ORDER GRANTING TCC'S MOTION TO SHORTEN TIME TO RESPOND TO THE TCC'S MOTION TO SEAL PORTIONS OF ITS OBJECTION TO THE MOTION FOR APPOINTMENT OF FUTURE CLAIMS REPRESENTATIVE	0.10	46.00
04/26/23	BPC	REVIEW TCC'S OBJECTION TO MOTION FOR APPOINTMENT OF FUTURE CLAIMS REPRESENTATIVE	0.50	230.00
04/26/23	BPC	REVIEW TCC'S OBJECTION TO MOTION FOR APPOINTMENT OF FUTURE CLAIMS REPRESENTATIVE	0.50	230.00
04/26/23	BPC	REVIEW TCC'S MOTION TO SHORTEN TIME TO RESPOND TO THE TCC'S MOTION TO SEAL PORTIONS OF ITS OBJECTION TO THE MOTION FOR APPOINTMENT OF FUTURE CLAIMS REPRESENTATIVE	0.10	46.00
04/26/23	BPC	PREPARE EMAILS TO COLE SCHOTZ LTL TEAM RE: 4/26 DOCKET FILINGS	0.20	92.00
04/26/23	WAU	REVIEW DRAFT BY-LAWS	0.20	190.00
04/26/23	LSM	DRAFT TWO PRO HAC VICE MOTIONS FOR S. VAN AALTEN AND J. ALBERTO	0.70	248.50
04/26/23	WAU	REVIEW FILINGS RE: FUTURE CLAIMS REPRESENTATIVE	0.50	475.00
04/27/23	BPC	PREPARE EMAILS TO COLE SCHOTZ LTL TEAM RE: 4/27 DOCKET FILINGS	0.20	92.00

Re: LTL AD HOC GROUP  
 Client/Matter No. 66055-0001

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<b><u>DATE</u></b>	<b><u>INITIALS</u></b>	<b><u>Description</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
04/27/23	BPC	PREPARE EMAIL TO STEERING COMMITTEE RE: MOTIONS TO DISMISS AND MOTION TO APPOINT FUTURE CLAIMS REPRESENTATIVE	0.50	230.00
04/27/23	BPC	REVIEW AD HOC GROUP OF MESOTHELIOMA CLAIMANTS' MOTION TO DISMISS	0.20	92.00
04/27/23	SLN	REVIEW DEBTORS MOTION TO APPOINT FUTURE REPRESENTATIVE (.5);	0.50	325.00
04/27/23	BPC	REVIEW ORDER GRANTING UST'S MOTION TO SHORTEN TIME TO RESPOND TO ITS MOTION TO SEAL PORTIONS OF ITS OBJECTION TO MOTION FOR APPOINTMENT OF A FUTURE CLAIMS REPRESENTATIVE	0.20	92.00
04/27/23	BPC	REVIEW DEBTOR'S MOTION FOR APPROVAL TO PAY OBLIGATIONS ARISING UNDER ORDER OF DISMISSAL	0.30	138.00
04/27/23	BPC	REVIEW MEMORANDUM OPINION GRANTING IN PART AND DENYING IN PART REQUEST FOR A PRELIMINARY INJUNCTION	0.70	322.00
04/27/23	BPC	REVIEW DEBTOR'S OBJECTION TO TCC'S MOTION TO SHORTEN TIME TO RESPOND TO ITS MOTION TO SEAL PORTIONS OF ITS OBJECTION TO MOTION TO APPOINT FUTURE CLAIMS REPRESENTATIVE	0.10	46.00
04/27/23	BPC	REVIEW AD HOC GROUP OF MESOTHELIOMA CLAIMANTS' REQUEST FOR DIRECT APPEAL OF 4/20 BENCH RULING	0.20	92.00
04/27/23	BPC	REVIEW UST'S MOTION TO SHORTEN TIME TO RESPOND TO ITS MOTION TO SEAL PORTIONS OF ITS OBJECTION TO MOTION FOR APPOINTMENT OF A FUTURE CLAIMS REPRESENTATIVE	0.10	46.00
04/27/23	BPC	REVIEW MRHFM'S OBJECTION TO MOTION FOR APPOINTMENT OF A FUTURE CLAIMS REPRESENTATIVE	0.40	184.00
04/27/23	SYC	CORRES WITH SVA AND B. CHURBUCK RE: NOTICES TO STEERING COMMITTEE	0.50	380.00
04/27/23	BPC	REVIEW UST'S OBJECTION TO MOTION FOR APPOINTMENT OF A FUTURE CLAIMS REPRESENTATIVE	0.50	230.00
04/27/23	BPC	REVIEW UST'S MOTION TO SEAL PORTIONS OF ITS OBJECTION TO MOTION FOR APPOINTMENT OF A FUTURE CLAIMS REPRESENTATIVE	0.10	46.00
04/27/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO M. TSUKERMAN RE: MOTIONS TO DISMISS	0.20	92.00
04/27/23	BPC	TELEPHONIC CONFERENCE WITH S. CARNES RE: 4/27 DOCKET FILINGS	0.10	46.00
04/27/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. CARNES RE: 4/27 DOCKET FILINGS	0.40	184.00
04/27/23	LSM	REVISE, FILE AND CIRCULATE TWO PRO HAC VICE MOTIONS FOR J. ALBERTO AND S. VAN AALTEN	0.70	248.50
04/28/23	MDS	REVIEW ELLIS DECLARATION	0.30	360.00
04/28/23	JRA	EMAILS WITH CLIENTS, PH AND INTERNALLY RE WORK STREAMS AND ISSUES LIST	0.80	592.00

Re: LTL AD HOC GROUP  
 Client/Matter No. 66055-0001

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/28/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO S. CARNES RE: 4/28 DOCKET FILINGS	0.20	92.00
04/28/23	BPC	REVIEW AD HOC COMMITTEE OF STATES' MOTION TO DISMISS	0.50	230.00
04/28/23	BPC	REVIEW PAUL CROUCH'S MOTION TO DISMISS	0.50	230.00
04/28/23	BPC	REVIEW CERTAIN MESOTHELIOMA CLAIMANTS' OBJECTION TO DEBTOR'S CONFIDENTIALITY DESIGNATIONS	0.40	184.00
04/28/23	BPC	PREPARE EMAILS TO STEERING COMMITTEE RE: 4/28 DOCKET FILINGS	0.40	184.00
04/28/23	MDS	REVIEW RESPONSE TO FUTURE CLAIMS REPRESENTATIVE	0.40	480.00
04/28/23	BPC	PREPARE EMAILS TO COLE SCHOTZ LTL TEAM RE: 4/28 DOCKET FILINGS	0.20	92.00
04/29/23	BPC	REVIEW DEBTOR'S MOTION TO SHORTEN TIME TO RESPOND TO ITS MOTION TO SEAL PORTIONS OF ITS OMNIBUS REPLY IN SUPPORT OF ITS MOTION FOR APPOINTMENT OF A FUTURE CLAIMS REPRESENTATIVE	0.10	46.00
04/29/23	BPC	PREPARE EMAIL TO STEERING COMMITTEE RE: 4/29 DOCKET FILINGS	0.20	92.00
04/29/23	BPC	REVIEW MESOTHELIOMA CLAIMANTS' JOINER TO TCC'S MOTION TO DISMISS	0.10	46.00
04/29/23	BPC	REVIEW DEBTOR'S MOTION TO SEAL PORTIONS OF ITS OMNIBUS REPLY IN SUPPORT OF MOTION FOR APPOINTMENT OF FUTURE CLAIMS REPRESENTATIVE	0.10	46.00
04/29/23	BPC	REVIEW RANDI ELLIS' DECLARATION IN SUPPORT OF HER APPOINTMENT AS FUTURE CLAIMS REPRESENTATIVE	0.30	138.00
04/29/23	BPC	REVIEW MRHFM'S MOTION TO DISMISS	0.20	92.00
04/29/23	BPC	REVIEW DEBTOR'S OMNIBUS REPLY IN SUPPORT OF MOTION FOR APPOINTMENT OF FUTURE CLAIMS REPRESENTATIVE	0.30	138.00

**FEE EMPLOYMENT** **0.60** **390.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/21/23	SLN	REVIEW OF DOCKET FOR TDP; CORRESPONDENCE WITH J. ALBERTO;	0.60	390.00

**LITIGATION** **67.50** **56,804.50**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/19/23	SVA	AHG KICK OFF CALL	0.70	665.00
04/19/23	JRA	BEGIN REVIEWING INFORMATIONAL BRIEF AND TRO PLEADINGS	1.50	1,110.00
04/19/23	SVA	CONF W/ PH AND CS TEAMS RE KICK OFF	0.60	570.00
04/20/23	WAW	ATTEND WEBINAR HEARING ON COURT'S PRELIMINARY INJUNCTION RULING	0.30	285.00
04/20/23	MDS	REVIEW ORDER SHORTENING TIME; HEARING ON DISCLOSURE STATEMENT/PLAN OF REORGANIZATION	0.90	1,080.00

Re: LTL AD HOC GROUP  
 Client/Matter No. 66055-0001

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<b><u>DATE</u></b>	<b><u>INITIALS</u></b>	<b><u>Description</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
04/20/23	SYC	ATTEND 4/20 HEARING	0.80	608.00
04/20/23	SYC	REVIEW BRIEFING ON MOTION TO DISMISS IN LTL1DEBTOR'S INFORMATIONAL STATEMENT RE REFILING, AD HOC TALC COMMITTEE'S INFORMATIONAL BRIEF AGAINST REFILING, AND MRHFM'S INFORMATIONAL STATEMENT AGAINST REFILING.	3.50	2,660.00
04/20/23	LSM	DRAFT CHART FOR EXHIBIT TO INITIAL STATEMENT OF AD HOC COMMITTEE OF SUPPORTING TALC CLAIMANTS	0.80	284.00
04/20/23	WAU	REVIEW PRELIMINARY INJUNCTION PLEADINGS (COMPLAINT; MOTION; ETC)	1.20	1,140.00
04/20/23	SVA	CONF W/ CO-COUNSEL RE PI HEARING AND NEXT STEPS	0.90	855.00
04/20/23	SVA	CONF W/ CLIENTS RE LITIGATION ISSUES	0.60	570.00
04/20/23	SVA	ATTEND PI HEARING	0.70	665.00
04/20/23	SVA	CORRES W/ CS TEAM RE INITIAL ACTION PLAN	0.20	190.00
04/20/23	SVA	REVIEWED FIRST DAY DECLARATION OF JOHN KIM	1.70	1,615.00
04/20/23	SVA	REVIEWED DEBTOR STATEMENT IN SUPPORT OF SECOND FILING	0.40	380.00
04/20/23	SVA	REVIEWED TCC INFORMATIONAL BRIEF RE SECOND BK FILING	0.70	665.00
04/20/23	SVA	REVIEWED BRIEFING ON CASE 1 MTD	2.30	2,185.00
04/20/23	SVA	REVIEWED MRHFM INFORMATIONAL BRIEF IN CONNECTION WITH SECOND FILING	0.90	855.00
04/20/23	SVA	REVIEW AHG INITIAL STATEMENT	0.40	380.00
04/20/23	SVA	CORRES W/ CLIENT RE PI HEARING	0.20	190.00
04/20/23	SVA	REVIEWED THIRD CIRCUIT REVERSAL ON CASE 1 MTD	0.60	570.00
04/20/23	SVA	REVIEWED BK DECISION DENYING MTD CASE 1	0.70	665.00
04/20/23	SVA	CORRES W/ AHG RE COMMENTS TO INITIAL STATEMENT	0.40	380.00
04/20/23	LSM	ADDITIONAL REVISIONS PER J. ALBERTO COMMENTS TO THE INITIAL STATEMENT OF AD HOC COMMITTEE OF SUPPORTING TALC CLAIMANTS	0.50	177.50
04/20/23	MDS	REVIEW AD HOC STATEMENT	0.40	480.00
04/20/23	LSM	UPDATE, FORMAT AND FORWARD TO J. ALBERTO THE INITIAL STATEMENT OF AD HOC COMMITTEE OF SUPPORTING TALC CLAIMANTS	0.90	319.50
04/21/23	BPC	REVIEW EMAIL FROM AND PREPARE EMAIL TO S. VAN AALTEN RE: TCC MOTION FOR DIRECT APPEAL AND MOTION TO INTERVENE	0.20	92.00
04/21/23	SYC	REVIEW TCC'S MOTION FOR DIRECT APPEAL OF THE PRELIMINARY INJUNCTION ORDER AND RELATED PLEADINGS	1.20	912.00
04/21/23	JRA	FURTHER EMAILS WITH S. VAN AALTEN, W. USATINE AND GROUP MEMBERS RE INVENTION AND INJUNCTION ISSUES	0.40	296.00
04/21/23	JRA	EMAILS WITH S. VAN AALTEN AND PH RE INTERVENTION	0.30	222.00
04/21/23	SVA	RESEARCH RE AHG INTERVENTION IN ADVERSARY PROCEEDING FOR PRELIMINARY INJUNCTION	1.40	1,330.00

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<b><u>DATE</u></b>	<b><u>INITIALS</u></b>	<b><u>Description</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
04/21/23	SVA	CONF W/ PH TEAM RE NEXT STEPS	0.50	475.00
04/21/23	SVA	REVIEWED TCC MOTION FOR DIRECT APPEAL OF PI ORDER	0.40	380.00
04/21/23	SVA	REVIEW/COMMENT ON AHG PRESS RELEASE	0.20	190.00
04/21/23	SVA	REVIEWED EXPENSE REIMBURSEMENT PLEADINGS RE AD HOC COMMITTEE OF STATE ATTORNEYS FROM CASE 1	0.60	570.00
04/21/23	WAU	REVIEW MOTION FOR DIRECT APPEAL AND EMAILS RE: SAME	0.60	570.00
04/21/23	JRA	REVIEW MOTION FOR DIRECT APPEAL	0.40	296.00
04/21/23	JRA	ANALYZE TCC MOTION TO INTERVENE	0.20	148.00
04/22/23	MDS	REVIEW FILED PLEADINGS; ORDER TO SHOW CAUSE	0.70	840.00
04/22/23	MT	REVIEW OF DISMISSAL PLEADINGS AND STAY PLEADINGS	3.30	2,062.50
04/22/23	SVA	CORRES W/ USATINE AND HANSEN RE MANDAMUS ON PI ORDER	0.20	190.00
04/22/23	SVA	CORRES W/ K. HANSEN AND M.MICELI RE 2019 STATEMENT AND ENGAGEMENT LETTERS	0.30	285.00
04/24/23	RTJ	REVIEW CORRESPONDENCE FROM PAUL HASTINGS	0.30	208.50
04/24/23	RTJ	REVIEW MOTION TO DISMISS	1.80	1,251.00
04/24/23	MT	REVIEW OF RELEVANT CASE PLEADINGS FROM LTL 1	2.40	1,500.00
04/24/23	SVA	REVIEWED TCC MOTION TO DIMISS	2.40	2,280.00
04/24/23	SVA	REVIEWED HEARING TRANSCRIPTS 4.11, 4.18 AND 4.20	2.70	2,565.00
04/24/23	SVA	CORRES W/ CS AND PH TEAMS RE PRO HACS	0.20	190.00
04/24/23	SVA	T/C W/ K. ROSEN RE PI AND MTD HEARINGS	0.50	475.00
04/25/23	SYC	REVIEW DEBTOR REPLY TO TCC MOTION TO SHORTEN AND ORDER DISSOLVING TRO	0.60	456.00
04/25/23	BPC	REVIEW ORDER DISSOLVING TRO AND RELATED DOCUMENTS	0.30	138.00
04/25/23	SVA	REVIEWED DEBTOR REPLY TO TCC MOTION TO SHORTEN NOTICE RE PI ORDER	0.10	95.00
04/25/23	RTJ	WORK ON SHORTENED NOTICE PLEADINGS	0.50	347.50
04/25/23	BPC	REVIEW EMAILS FROM AND PREPARE EMAILS TO COLE SCHOTZ LTL TEAM RE: ORDER DISSOLVING TRO AND RELATED DOCUMENTS	0.20	92.00
04/26/23	SVA	REVIEW/COMMENT ON MOTION TO SHORTEN INTERVENTION MOTION	0.40	380.00
04/26/23	SVA	CORRES W/ USATINE AND JARECK RE AHG INTERVENTION AND MOTION TO SHORTEN NOTICE	0.20	190.00
04/26/23	WAU	CONFERENCE WITH CS TEAM RE: UPCOMING MOTION AND STRATEGY	0.30	285.00
04/26/23	RTJ	REVIEW AND REVISE SEALING PLEADINGS; REVIEW LTL PROTOCOLS RE: SEALING; REVIEW PLEADINGS	1.90	1,320.50
04/26/23	MDS	REVIEW MOTION TO SATISFY OBJECTIONS UNDER DISMISSAL ORDER	0.40	480.00
04/26/23	SVA	T/C W/ M. MICHELI AND S. CARNES RE AHG INTERVENTION IN ADVERSARY PROCEEDING	0.30	285.00



**COLE SCHOTZ P.C.**

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<b><u>DATE</u></b>	<b><u>INITIALS</u></b>	<b><u>Description</u></b>	<b><u>HOURS</u></b>	<b><u>AMOUNT</u></b>
04/26/23	SYC	BRIEF REVIEW OF MOTION TO SHORTEN AND MOTION TO INTERVENE	0.60	456.00
04/26/23	SVA	REVIEWED TCC OBJECTION TO FCR APPOINTMENT MOTION	0.40	380.00
04/26/23	SYC	CALL WITH PH RE: MOTION TO SHORTEN ON MOTION TO INTERVENE AND 2019 STATEMENT	0.40	304.00
04/26/23	SYC	CALLS AND EMAILS WITH SVA AND W. USATINE RE: MOTION TO SHORTEN ON MOTION TO INTERVENE AND 2019 STATEMENT	0.60	456.00
04/26/23	MDS	REVIEW MOTIONS TO APPOINT FUTURE CLAIMS REPRESENTATIVE; MOTION TO SHORTEN TIME ON SEAL; OBJECTION TO FUTURE CLAIMS REPRESENTATIVE	1.90	2,280.00
04/26/23	JRA	CONFER INTERNALLY RE STRATEGY ON TDP'S AND 2019; RESEARCH AND EMAILS RE 2019	1.00	740.00
04/26/23	JRA	T/C WITH W. USATINE AND S. VAN AALTEN; CONFER WITH S. VAN AALTEN RE SEALING/INTERVENTION/TDP	0.70	518.00
04/26/23	WAU	REVIEW MOTION TO SEAL AND PROVIDE COMMENTS	0.50	475.00
04/26/23	WAU	REVIEW MOTION FILING RE: DIRECT APPEAL TO THIRD CIRCUIT	0.40	380.00
04/27/23	SVA	REVIEWED MRHFM'S OBJECTION TO FCR APPOINTMENT	0.70	665.00
04/27/23	RTJ	REVIEW RESEARCH AND INVESTIGATION REPORTS	0.70	486.50
04/27/23	RTJ	REVIEW LTL PLEADINGS	0.60	417.00
04/27/23	SVA	REVIEW UST OBJECTION TO FCR APPOINTMENT	0.20	190.00
04/27/23	SVA	REVIEWED OPINION GRANTING/DENYING PI MOTION	0.80	760.00
04/27/23	JRA	REVIEW OBJECTIONS TO FCR APPOINTMENT	0.50	370.00
04/27/23	SYC	REVIEW BRIEFING ON DEBTOR'S MOTION TO APPOINT FUTURE CLAIMS REP & TCC AND UST OBJECTIONS (AND RELATED SEALING MOTIONS/MOTIONS TO SHORTEN)	1.80	1,368.00
04/27/23	SVA	REVIEW DEBTOR'S MOTION TO SATISFY OBLIGATIONS UNDER FIRST CASE DISMISSAL ORDER	0.40	380.00
04/27/23	JRA	REVIEW PI OPINION	0.60	444.00
04/27/23	RTJ	REVIEW INJUNCTION DECISION	0.80	556.00
04/28/23	SVA	REVIEWED TCC'S LETTER RE MTD	0.10	95.00
04/28/23	SVA	REVIEWED SATTERLY OBJECTION TO DEBTOR CONFIDENTIALITY DESIGNATIONS RE PSA TERM SHEET AND BOARD MINUTES	0.30	285.00
04/28/23	SVA	CORRES W/ S. CARNES AND B. CHURBUCK RE ADVERSARY PROCEEDING FILINGS	0.20	190.00
04/28/23	JRA	REVIEW TCC LETTER RE MOTION TO DISMISS	0.10	74.00
04/28/23	SVA	REVIEWED TCC'S LETTER RE CONFIDENTIALITY DESIGNATIONS BY DEBTOR	0.10	95.00
04/28/23	JRA	REVIEW STATES' MOTION TO DISMISS	0.40	296.00
04/28/23	SYC	REVIEW AHGMC'S MTD AND REQUEST FOR DIRECT APPEAL	0.80	608.00
04/28/23	SYC	REVIEW TCC LETTERS TO COURT ON MTD AND CONFIDENTIALITY	0.50	380.00

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<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/28/23	MDS	REVIEW RECENTLY FILED PLEADINGS AND LETTER TO COURT	0.50	600.00
04/28/23	SVA	REVIEWED AD HOC COMMITTEE OF STATES MOTION TO DISMISS CASE	1.20	1,140.00
04/28/23	SVA	REVIEWED PAUL CROUCH MOTION TO DISMISS CASE	0.30	285.00
04/28/23	SVA	REVIEWED ORDER APPROVING SERVICE PROCEDURES FOR SUMMONS, COMPLAINT AND OTHER ADVERSARY PROCEEDING FILINGS	0.20	190.00

**PLAN OF REORGANIZATION** **7.90** **7,316.00**

<u>DATE</u>	<u>INITIALS</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/20/23	SVA	CONF W/ CLIENTS RE PLAN ISSUES	0.70	665.00
04/21/23	SVA	CORRES W/ AHG RE PLAN, TDP AND MATRIX ISSUES	0.30	285.00
04/21/23	SVA	T/C W/ AHG RE PLAN ISSUES	0.50	475.00
04/21/23	JRA	EMAILS INTERNALLY RE TDP RESEARCH	0.30	222.00
04/22/23	SVA	T/C W/ PH AND JD TEAMS RE CASE ISSUES	0.60	570.00
04/22/23	JRA	EMAILS INTERNALLY AND WITH PH RE TRANSCRIPTS AND OTHER ADMIN ISSUES (.4); T/C WITH S. VAN AALTEN RE TDP AND CASE STRATEGY (.2)	0.60	444.00
04/25/23	SVA	CONF W/ PH AND PR RE BYLAWS AND PLAN ISSUES	0.50	475.00
04/25/23	SVA	REVIEWED PR RESEARCH RE VOTING PROCEDURES IN OTHER MASS TORT CASES	2.30	2,185.00
04/25/23	SVA	CONF W/ STEERING COMMITTEE RE PLAN ISSUES AND BYLAWS	0.40	380.00
04/27/23	SVA	REVIEWED PLAN AND TDP COMMENTS FROM STEERING CO.	0.40	380.00
04/28/23	SVA	CORRES RE PLAN TERM SHEET AND TDPS	0.40	380.00
04/29/23	SVA	REVIEW ELLIS DECLARATION IN SUPPORT OF FCR RETENTION	0.30	285.00
04/29/23	SVA	REVIEWED DEBTOR OMNIBUS REPLY TO ELLIS FCR APPOINTMENT MOTION	0.60	570.00

TOTAL HOURS 127.30

PROFESSIONAL SERVICES: \$96,181.00

**TIMEKEEPER SUMMARY**

<u>NAME</u>	<u>TIMEKEEPER TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Bryant P. Churbuck	Associate	13.10	460.00	6,026.00
Justin R. Alberto	Member	12.20	740.00	9,028.00
Mark Tsukerman	Member	9.90	625.00	6,187.50
Michael D. Sirota	Member	9.70	1,200.00	11,640.00
Morton, Larry	Paralegal	15.90	355.00	5,644.50
Ryan T. Jareck	Member	9.40	695.00	6,533.00

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<u>NAME</u>	<u>TIMEKEEPER TITLE</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Sarah A. Carnes	Member	14.70	760.00	11,172.00
Seth Van Aalten	Member	35.70	950.00	33,915.00
Stacy L. Newman	Member	1.10	650.00	715.00
Warren A. Usatine	Member	5.60	950.00	5,320.00
	<b>Total</b>	<b>127.30</b>		<b>\$96,181.00</b>

#### **COST SUMMARY**

<u>Description</u>	<u>AMOUNT</u>
COURT FEES	60.60
PHOTOCOPYING / PRINTING / SCANNING	4.40
DEPOSITIONS TRANSCRIPT	522.90
<b>TOTAL COSTS</b>	<b>\$587.90</b>

TOTAL SERVICES AND COSTS: \$ 96,768.90

#### **TASK SUMMARY**

<u>TASK CODE</u>	<u>Description</u>	<u>HOURS</u>	<u>AMOUNT</u>
NJ821	LITIGATION	67.50	56,804.50
NJ839	CASE ADMINISTRATION	51.30	31,670.50
NJ842	FEE EMPLOYMENT	0.60	390.00
NJ851	PLAN OF REORGANIZATION	7.90	7,316.00
	<b>Total</b>	<b>127.30</b>	<b>\$96,181.00</b>



LTL MANAGEMENT LLC  
N/A

Invoice Date: July 13, 2023  
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**REMITTANCE PAGE**

PROFESSIONAL SERVICES THROUGH APRIL 30, 2023

**Client:** AD HOC GROUP OF SUPPORTING COUNSEL  
**Matter:** LTL AD HOC GROUP

TOTAL FEES:	\$	96,181.00
TOTAL COSTS:	\$	<u>587.90</u>
TOTAL DUE THIS INVOICE:	\$	96,768.90

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